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July 21, 2026

The Honorable Gus Bilirakis  
Chairman, Subcommittee on Commerce,  
Manufacturing, and Trade  
House Energy & Commerce Committee  
2125 Rayburn House Office Building  
Washington DC 20515

The Honorable Jan Schakowsky  
Ranking Member, Subcommittee on  
Commerce, Manufacturing, and Trade  
House Energy & Commerce Committee  
2323 Rayburn House Office Building  
Washington DC 20515

Dear Chairman Bilirakis and Ranking Member Schakowsky,

The International Bottled Water Association (IBWA) commends the Subcommittee for convening this hearing on “Legislative Proposals to Strengthen Consumer Protection In A Changing Marketplace” and offers its perspective on the Packaging and Claims Knowledge (PACK) Act of 2025 (H.R. 6832) and the Recycled Materials Attribution Act (H.R. 7502).

Founded in 1958, IBWA’s membership consists of U.S. and international bottlers and distributors that produce and deliver bottled water products and the equipment and material suppliers that serve them. IBWA unifies the bottled water industry and represents an uncompromising commitment to the safety, sustainability and availability of bottled water. Crucially, while our association represents major national brands, more than 50 percent of IBWA’s member companies are small, locally owned, family enterprises deeply rooted in their communities.

### ***Labeling Uniformity and Interstate Commerce***

IBWA supports a uniform, comprehensive system of environmental and product labeling standards for bottled water at the national level that fully protects public health, prevents consumer deception, and allows consumers easy access to clear and accurate information. The current, rapidly expanding patchwork of conflicting state and local packaging requirements impedes interstate commerce, creates manufacturing inefficiencies, and ultimately results in consumer confusion and higher consumer prices.

U.S. citizens benefit from the unimpeded interstate commerce of consumer products. A national, uniform standard for environmental marketing claims facilitates broader consumer understanding by providing a single, consistent baseline for product comparisons effectively preventing the deceptive or contradictory mandates that inevitably arise from conflicting state requirements .

When states independently legislate differing labeling laws, marketing bottled water across state boundaries becomes cost-prohibitive and logistically impractical. A uniform national standard allows bottlers to efficiently apply the same label without regard to which state the product may ultimately serve.

The promulgation of federal labeling laws and regulations has sought a necessary balance between the government's responsibility to protect public health and provide consumer transparency, and the economic reality of bottled water companies to efficiently and cost effectively bring their products to market. Both the PACK Act and RMAA represent meaningful legislative frameworks aimed at addressing this unsustainable patchwork of state laws.

### ***PACK Act***

IBWA believes the PACK Act represents a vital step to provide the regulatory certainty required for national manufacturing and distribution operations by pre-empting state laws on the use of the terms “recyclable,” “compostable,” and “reusable” on labels. The fragmentation of state and local rules causes significant compliance disruptions for bottlers and distributors, while severely diluting consumer confidence in recycling programs and outcomes.

IBWA appreciates the thoughtful refinements made to the legislation—including appropriate compliance runaways for emerging areas like reuse certification—which ensure that verification mechanisms remain practical and implementable for manufacturers of all sizes.

### ***RMAA***

Producing new products from recycled Polyethylene Terephthalate (rPET) uses two-thirds less energy than required to make products from virgin plastic, and a substantial portion of our membership actively utilizes high percentages of rPET—with many brands reaching 50%, 75%, or even 100% rPET.

IBWA supports the concept of uniform federal definitions for recycling and recycled content marketing claims to reduce consumer confusion and create essential marketplace certainty for businesses. Clear national standards for attributing and marketing recycled content are critical to improving recycling outcomes, recovering valuable feedstocks, and meeting consumer demand for recycled materials and sustainable packaging.

As advanced recycling technologies continue to mature alongside traditional mechanical systems, IBWA emphasizes that any attribution or verification programs established under the RMAA must remain practical and commercially viable, ensuring transparent

and uniform accounting methodologies that protect supply chain integrity while supporting broad access to high-quality recycled materials. .

## ***Conclusion***

The bottled water industry has long demonstrated an unwavering, data-backed commitment to environmental stewardship. Bottled water containers are one of the most recycled beverage containers in the country. As the #1 beverage in volume, bottled water containers only account for 3.3 percent of all drink packaging found in US landfills.

As a leader in the use of recycled materials, bottled water businesses already are advancing a circular economy. Any federal framework targeting packaging infrastructure should encourage a "shared responsibility" model across the entire supply chain rather than singling out specific categories or industries.

Additionally, IBWA strongly advocates for complementary bipartisan infrastructure policies, such as the Recycling Infrastructure and Accessibility Act (RIAA), to expand EPA funding for rural and underserved recycling access. Investing in next-generation sorting and collection technologies will rapidly improve material recovery rates for high-value recyclables like PET.

We thank the Subcommittee for its dedicated attention to these critical issues and stand ready to serve as a technical and regulatory resource to help forge practical, national solutions.

Sincerely,

A handwritten signature in black ink, appearing to read 'MH', with a long horizontal line extending from the end of the signature.

Matt Herrick  
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